

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JACQUE HOLLANDER

Plaintiff

v.

JAMES BROWN

JAMES BROWN ENTERPRISES, INC.

Defendant

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JUDGE GOTTSCHALL

Case No.

050 0057

MAGISTRATE JUDGE SCHENKIER

COMPLAINT

Plaintiff, JACQUE HOLLANDER, by and through her attorney Donald Rosen,  
for her complaint against Defendants JAMES BROWN (hereinafter referred to as  
"Brown") and JAMES BROWN ENTERPRISES, INC. (hereinafter referred to as  
"Brown Enterprises"), both jointly and severally, and alleges as follows:

PARTIES

1. Plaintiff is a citizen of Illinois.
2. On information and belief, Defendant Brown is a citizen of South Carolina  
whose address is 430 Douglas Drive, Beach Isling South Carolina.
3. On information and belief, Defendant Brown Enterprises is a corporation  
licensed and doing business in Georgia, whose main offices are located at [REDACTED]  
[REDACTED], Augusta Georgia.

### JURISDICTION AND VENUE

4. Federal Court original jurisdiction of this action is conferred pursuant to 28 U.S.C. § 1332 because this matter is between citizens of different states and the amount in question exceeds \$75,000 (seventy five thousand dollars.)

5. Federal Court supplemental jurisdiction of this action is conferred pursuant to 28 U.S.C. § 1367 as all claims in this action are related to and form the same controversy that regards Federal Court original jurisdiction.

6. Jurisdiction in the Northern District of Illinois is proper pursuant to 28 U.S.C. § 1391 because a substantial part of the events giving rise to the claim occurred in the Northern District of Illinois.

### STATEMENT OF THE CASE

7. Between the years 1987 and 1988, Defendants retained Plaintiff to aid them with public relations. As part of the compensation for this service, Defendants agreed to aid Plaintiff in her aspirations to establish a career as a songwriter.

8. On information and belief, Albert Dallas (hereinafter referred to as "Dallas") was the attorney for both Brown and Brown Enterprises during the entire period relevant to the claims contained herein.

9. Between March and April of 1988, Dallas requested that Plaintiff provide him with a waiver and letter of recommendation that she is of good character and could accompany Brown as a passenger in his vehicle. Plaintiff, with Dallas' advice, had an attorney prepare the document. Plaintiff agreed to meet Brown and Dallas at the

corporate offices of Brown Enterprises in Augusta, Georgia to deliver the document and discuss their plans for Plaintiff's songwriting career.

10. In April of 1988, Plaintiff arrived at the offices of Brown Enterprises. There she met with Brown and Dallas. The parties had some perfunctory discussion of what Plaintiff's name and appearance should be. Brown stated that he would call Plaintiff Jackie Doll. Brown then wrote the name on a piece of paper, and handed the paper to Plaintiff. Brown then asked Plaintiff to run an errand and pick up some Brunswick stew for him at a local store.

11. Plaintiff ran the errand as requested. When she returned, Brown was having an argument with Dallas. Dallas told Plaintiff to accompany Brown in Brown's van because Brown wanted to show Plaintiff a Volkswagen Rabbit that he was having customized for his daughter's birthday.

12. Plaintiff first went to her car, which was parked near Brown's van, in order to store some tapes that she brought with her. From her car, Plaintiff observed Brown exit the offices alone carrying what appeared to be a shotgun. Brown entered his van and waited for Plaintiff to join him.

13. Plaintiff assumed that the shotgun was for Brown's personal security in the absence of bodyguards. Plaintiff accompanied Brown in his van and Brown drove to an automobile dealership where, at Brown's request, Plaintiff was given a tour of the facility by dealership staff. While Plaintiff toured the facility, Brown met with other staff at the dealership for about an hour. Plaintiff was never shown a specific vehicle that Brown was having customized.

14. After Brown returned, Plaintiff accompanied Brown from the dealership into his van. Plaintiff expected that Brown would return Plaintiff to the office where her car was located.

15. Brown began driving recklessly, speeding and swerving unexpectedly. Plaintiff observed foam forming in Brown's mouth and that Brown exhibited spastic facial movements. Plaintiff pleaded with Brown to slow down the vehicle, but he refused. Brown spoke incoherently about his observations on trees and other scenery. Brown stated to Plaintiff that the government was following him and that the government was putting things in his water. He threatened Plaintiff to silence.

16. Brown exited the highway onto a deserted property in South Carolina and stopped the vehicle.

17. Brown ordered Plaintiff into the back seat of the van. Brown then ordered Plaintiff to remove her clothing. Plaintiff pleaded with Brown not to make her do this. Brown responded by grasping the shotgun and threatening to harm Plaintiff if she failed to comply.

18. Over the next several hours Brown raped, beat and mentally tortured Plaintiff. Brown eventually returned Plaintiff to the office in Augusta Georgia. Brown threatened that he would have Plaintiff killed if she told anyone what had happened.

19. On or about December 27, 2000, in Illinois, Plaintiff was diagnosed with the condition known as "Grave's Disease."

20. In 2003, in Illinois, Plaintiff's treating physician informed her that the actual and proximate cause of her Grave's disease was the rape and torture perpetrated by Brown in 1988.

21. Grave's Disease is a degenerative condition that will cause significant health problems and possibly premature death.

**COUNT I – FALSE IMPRISONMENT (BROWN)**

22. Paragraphs 6 – 21 are re-alleged and made part of this section as Count I.

23. Plaintiff could not exit the van driven by Brown without causing herself grievous bodily injury.

24. Despite repeated requests by Plaintiff, Brown refused to allow Plaintiff to leave the van.

25. Brown refused to stop or even slow down the van until he arrived at the secluded area at which he tortured and raped Plaintiff.

26. Brown did not have a lawful reason or process to detain Plaintiff.

27. After Brown stopped the vehicle, Brown threatened Plaintiff with bodily harm if she attempted to leave. It was reasonable for Plaintiff to believe that such harm was imminent as Brown brandished a deadly weapon and appeared capable of using it.

28. As a direct result of the previously described events, Plaintiff suffers damages from the condition known as Grave's Disease.

**COUNT II – SEXUAL ASSAULT AND BATTERY (BROWN)**

29. Paragraphs 6 – 21 are re-alleged and made part of this section as Count II.

30. After stopping the vehicle, Brown brandished his shotgun and performed the following acts to Plaintiff under the threat of deadly force:

- a. Brown threatened to kill Plaintiff.
- b. Brown forced Plaintiff, to take off her clothes.
- c. Brown forced Plaintiff to have sexual intercourse.

- d. Brown battered Plaintiff by striking Plaintiff, pulling Plaintiff's hair, slamming her head against the inside of the car wall and slamming Plaintiff's body against various surfaces inside the van.
- e. Brown forced Plaintiff to have oral sex.
- f. Brown attempted to sodomize Plaintiff.

31. At no time did Plaintiff consent to any of the above acts. Plaintiff's participation in the above acts was prompted by fear of Brown's threat to harm her if she failed to comply. It was reasonable for Plaintiff to believe that such harm was imminent as Brown brandished a deadly weapon and appeared capable of using it.

32. As a direct result of the previously described events, Plaintiff suffers damages from the condition known as Grave's Disease.

#### COUNT III – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (BROWN)

33. Paragraphs 6 – 21 are re-alleged and made part of this section as Count III.

34. Brown knew, or should have known, that the previously described events would cause significant trauma to Plaintiff.

35. The stress related to the previously described events did cause significant psychological and physiological trauma to Plaintiff.

36. As a direct result of the previously described events, Plaintiff suffers damages from the condition known as Grave's Disease.

#### COUNT IV – NEGLIGENCE (BROWN AND BROWN ENTERPRISES)

37. Paragraphs 6 – 21 are re-alleged and made part of this section as Count IV.

38. On information and belief, immediately prior to or while traveling with Plaintiff, Brown ingested, or otherwise took, a substance that impaired his ability to conduct himself with reasonable safety.

39. As an invited passenger, Brown owed a duty to Plaintiff to not partake in a substance that would so impair his ability that it would place Plaintiff in jeopardy.

40. It was reasonably foreseeable that Brown's actions would result in injury to Plaintiff.

41. Plaintiff's injuries are a direct and proximate result of Brown's actions.

42. On information and belief, Brown Enterprises knew of Brown's behavior and drug usage and failed to take steps to mitigate the situation. Brown Enterprises owed a duty to Plaintiff to either act to prevent Brown from taking Plaintiff in his vehicle, or to warn Plaintiff of the risks.

43. As a direct result of the previously described events, Plaintiff suffers damages from the condition known as Grave's Disease.

#### COUNT V – RESPONDEAT SUPERIOR (BROWN ENTERPRISES)

44. Paragraphs 6 – 43 are re-alleged and made part of this section as Count V.

45. Plaintiff met with, and accompanied Brown pursuant to her music career and public relations employment with Brown Enterprises. Brown and Dallas implied, and it was understood by Plaintiff, that Brown intended to continue discussing Plaintiff's career during the excursion to the automobile dealership.

46. On information and belief, Brown Enterprises knew of Brown's behavior and drug usage and failed to take steps to mitigate the situation.



47. As a direct result of the previously described events, Plaintiff suffers damages from the condition known as Grave's Disease.

RELIEF SOUGHT

48. Plaintiff seeks compensatory damages of \$5,000,000 for past and future medical costs.

49. Plaintiff seeks compensatory damages of \$100,000,000 for physical and emotional distress.

50. Plaintiff seeks compensatory damages of \$1,000,000 for loss of past and future earnings.

51. Plaintiff seeks reasonable court costs and fees related to this action.

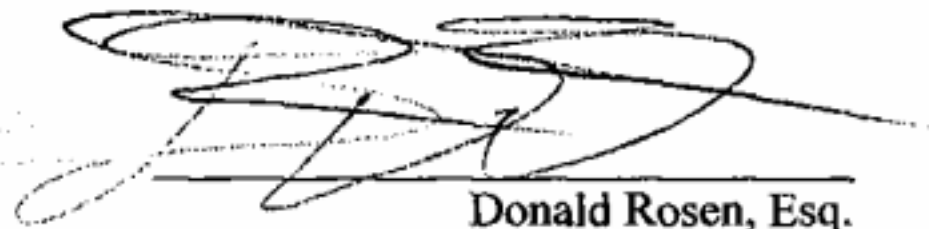
52. Plaintiff seeks punitive damages to be determined.

53. Plaintiff seeks any other relief as may be reasonable and just.

54. *Just Damages Requested*

RESPECTFULLY SUBMITTED,  
JACQUE HOLLANDER

By: Her Counsel



Donald Rosen, Esq.  
ARDC #6278899

[REDACTED]  
Carpentersville, Illinois 60110  
(847) [REDACTED]